

EPA Review of Appendix 4E: Manufacturer's Data Report on Inflatable Berms.

1. EPA Region 10 has reviewed Appendix 4E. Actual laboratory results are required so that we can accept the PVC material specifications presented in the RD&D Permit Application. DOE-RL should provide/propose the ASTM Methods which were/will be used for these tests. EPA will evaluate these recommended methods.

The following information is required:

- Inflatable Berm Material:

- o Weight
- o Puncture
- o Tear
- o Tensile
- o Shear

- Seam Information:

- o Peel
- o Shear

2. A coupon of berm material will be required to be exposed as part of the berm, to provide a representative sample of the deterioration of the berm material. This coupon will be tested when a spill has occurred or at least once a year to determine the actual degradation of the material.

3. The following additional calculations are also required:

- o compression failure
- o impact failure
- o puncture failure
- o seam failure

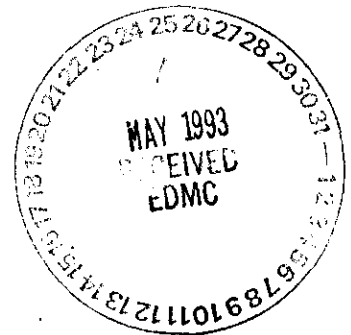
4. Verify that a concrete base will be used to support the inflatable berm. Provide calculations on concrete design.

5. Specify the time limit that the tanker truck will be on the berm material during loading and unloading operations.

6. Clarify if an additional bottom ply will be used as specified in the manufacturer's data page 3, line #12.

7. Provide the actual number of the berm which will be used.

8. The inflatable berm should be covered when not in use to minimize degradation due to weather, UV etc.



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EPA REGION 10 --- WMD/ERD

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If you have any questions regarding these comments please contact Dan Duncan at (206) 553-6693 to arrange for a conference call.

cc: Cathy Massimino, EPA

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